What will a Typical Styrene Air Compliance Inspection Involve?

*This fact sheet provides examples of what an IDEM air compliance inspector may look for during an inspection related to the Indiana Styrene Rule. These are only examples. This fact sheet does not limit what an IDEM inspector may request during an inspection. You may be asked to provide information beyond what is covered in this fact sheet. This fact sheet only contains information pertaining to 326 IAC 20-25. The IDEM inspector will also review your compliance with your permit and rules other than Rule 25 during the inspection.

A typical inspection will not be scheduled with you beforehand, it will be an unannounced inspection. There are generally two main components of the inspection: a review of records and a plant walk-through.

A. Records Review: The inspector will sit down with you to review the entire required record keeping. The inspector will ask for the following records. They must be available on-site.

1. The inspector will want to see proof of how you are complying with the rule. Depending on the option you choose, you will need to provide the following documents.
   - Compliant Materials
     - Certified product data sheets (CPDS) and/or material safety data sheets (MSDS) for each material subject to the emission limits (the HAP content, in weight percent, as applied, for each material subject to the emission limits should be listed on your CPDS or MSDS or in your calculations)
   - Averaging
     - Certified product data sheets and/or material safety data sheets for each material subject to the emission limits (should include HAP content in weight percent);
     - Records of the amount of material used each month;
     - Copies of the averaging calculations
   - Add-on Control Device
     - Certified product data sheets and/or material safety data sheets for each material (should include HAP content in weight percent);
     - Copies of the calculations demonstrating equivalency of using a control system;
     - Records of the daily average value of each continuously monitored parameter; and
     - For facilities using a fluidized bed catalytic incinerator, records of the pressure drop across the catalyst bed.

2. The inspector will review your Operator Training Program
   - The inspector will want to review exactly what you are using to train employees (training

materials including videos, computer programs, and overheads)-Does it contain all necessary info?

1. A list of current personnel by name, that are required to be trained and dates they were trained, and date of most recent refresher training;
2. A copy of the current training program/lesson plans for training courses including the initial and annual refresher training programs. Be sure to include:
   - **T** appropriate application techniques,
   - **T** appropriate equipment cleaning procedures,
   - **T** appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and

- **$** When you begin the plant walk-through, the inspector will be looking at operator spray techniques to see if your training program was successful.

B. Plant Walk-Through: Inspector will walk through the facility

- ‘ Inspector will be looking for open containers. All containers should be closed. This includes HAP containing materials (resins, gel coats, cleaning solvents, waste resins, waste gel coats, waste rags, etc). If the inspector points out a container that is open, close it immediately in his/her presence.
- ‘ The containers that contain the solvent used to clean guns and gun lines must be closed.
- ‘ Containers associated with cleaning are closed when not in use.
- ‘ Inspector will be watching your sprayers and possibly talking to your employees for proper technique (gun setup, distance from the part, part thickness, perpendicular spray, knowledge of the process, training, etc.)
- ‘ Inspector will look at/listen to/test gun tip pressures and fan size.
- ‘ Inspector will check spray guns to be sure they are compliant.
- ‘ Inspector will check for excessive overspray. Evidence of excessive overspray may indicate improper spray technique and a need for retraining of the operator.

C. Follow-up: The IDEM inspector will provide an oral report at the conclusion of the inspection. The oral report will include specific matters discovered during the inspection that the inspector believes may be in violation of the rules or permit.